

**In Re: Valsartan Products Liability Litigation, Civil Action No. 1:19-MS-02875-RBK-JC**

**APPENDIX TO CASE MANAGEMENT PROPOSAL OF MAINE AUTOMOBILE  
DEALERS ASSOCIATION INC. INSURANCE TRUST ON BEHALF OF PROPOSED  
CLASS OF THIRD-PARTY PAYERS AND MOTION TO APPOINT  
INTERIM CO-LEAD CLASS COUNSEL FOR THIRD-PARTY PAYERS**

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**TABLE OF EXHIBITS**

<b><u>Exhibit</u></b>	<b><u>Document</u></b>
<b><u>Exhibit A</u></b>	Proposed Order
<b><u>Exhibit B</u></b>	Order denying Motion for Leave to File MSP Plaintiffs Motion for Appointment to a Position on The Plaintiffs' Executive Committee in <i>In Re: National Prescription Opiate Litigation</i> , MDL 2804 (N.D. Ohio.)
<b><u>Exhibit C</u></b>	Motion for Leave to File MSP Plaintiffs Motion for Appointment to a Position on The Plaintiffs' Executive Committee, in <i>In Re: National Prescription Opiate Litigation</i> , MDL 2804 (N.D. Ohio.)
<b><u>Exhibit D</u></b>	Corporate Disclosure Statement, <i>MAO-MSO Recovery II, LLC et al. v. State Farm Mutual Automobile Insurance Co.</i> , No. 3:17-cv-321 (S.D. Ill, March 28, 2017), ECF No. 2
<b><u>Exhibit E</u></b>	Corporate Disclosure Statement, <i>MAO-MSO Recovery II, LLC et al. v. The Farmers Insurance Exchange et al.</i> , No. 2:17-cv-02559 (C.D. Cal. April 3, 2017), ECF No. 5
<b><u>Exhibit F</u></b>	Corporate Disclosure Statement, <i>MAO-MSO Recovery II, LLC v. State Farm Mutual Auto Insurance Company</i> , Nos. 18-2377 and 18-2463 (7 <sup>th</sup> Cir. Dec. 17, 2018)
<b><u>Exhibit G</u></b>	Corporate Disclosure Statement, <i>MAO-MSO Recovery II, LLC et al. v. American Family Mutual Insurance Co. et al.</i> , No. 17-cv-175 (W.D. Wisc. March 8, 2017), ECF No. 3
<b><u>Exhibit H</u></b>	Florida Division of Corporations filing by Plaintiff filed June 21, 2018 (Plaintiffs "Application by Foreign Limited Liability Company for Authorization to Transact Business in Florida")

## **EXHIBIT A**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN PRODUCTS  
LIABILITY LITIGATION

Civil Action No. 1:19-MD-02875-RBK-JS

THIS DOCUMENT RELATES TO:

*ALL ACTIONS*

**PROPOSED ORDER APPOINTING LOWEY DANNENBERG, P.C. AND  
PRETI FLAHERTY BELIVEAU & PACHIOS, LLP, AS INTERIM CLASS COUNSEL  
FOR THE PROPOSED CLASS OF THIRD-PARTY PAYERS**

The Court finds that the different plaintiff groups in this litigation have, in addition to their common interests, certain conflicting interests. For that reason, and for the reasons given in the Case Management Proposal and Motion to Appoint Interim Co-Lead Counsel for Third-Party Payers filed by Plaintiff Maine Automobile Dealers Association, Inc. Insurance Trust, third-party payer plaintiffs require separate representation and separate leadership. The Court therefore appoints Lowey Dannenberg, P.C. and Preti Flaherty Beliveau & Pachios, LLP, under Rule 23(g), as interim class counsel for the proposed class of third-party payers.

\_\_\_\_\_  
Honorable Robert B. Kugler  
U.S. District Judge

## **EXHIBIT B**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

Motion DENIED  
IT IS SO ORDERED.  
s/ Dan A. Polster  
U.S. District Judge  
7/31/2018

_____	)	MDL 2804
IN RE: NATIONAL PRESCRIPTION	)	
OPIATE LITIGATION	)	CASE NO.: 1:17-MD-2804
	)	
THIS DOCUMENT RELATES TO:	)	JUDGE DAN A. POLSTER
	)	
ALL CASES	)	
_____	)	

**MOTION FOR LEAVE TO FILE MSP PLAINTIFFS' MOTION FOR  
APPOINTMENT TO A POSITION ON THE PLAINTIFFS' EXECUTIVE COMMITTEE**

Plaintiffs, MSP Recovery Claims, Series LLC, MSPA Claims 1, LLC and MAO-MSO Recovery II, LLC (collectively, “the MSP Plaintiffs”), on behalf of themselves and a class of similarly-situated entities and their assignees, by and through undersigned counsel, respectfully move for leave to file a Motion for Appointment to a Position on the Plaintiffs’ Executive Committee. In support, the MSP Plaintiffs state as follows:

1. The MSP Plaintiffs filed two separate, but similar, class action complaints that are now pending before this Court: *MSP Recovery Claims, Series LLC v. Purdue Pharma, L.P., et al.*, Case No.: 1:18-OP-45091 (N.D. Ohio); and *MSPA Claims 1, LLC, et al. v. Anda, Inc., et al.*, Case No.: 1:18-OP-45526 (N.D. Ohio). The MSP Plaintiffs and putative class members have the unique position of being “**payors of last resort**” in that they stand in the same shoes as their respective state Medicaid agencies (“PLR Class”).<sup>1</sup> This class of Plaintiffs may be the largest in the litigation,

<sup>1</sup> Medicaid, as used herein, means the joint federal-state medical assistance program authorized by Title XIX of the Social Security Act, 42 U.S.C. § 1396, et seq. Under the federal scheme, Medicaid is intended to be the “payor of last resort.” See Federal Register, Vol. 81, No. 88, 27498 through 27901, 27769 (May 6, 2016). Title XIX of the Act requires state Medicaid agencies to identify and seek payment from liable third parties, before billing Medicaid.

## **EXHIBIT C**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION**

THIS DOCUMENT RELATES TO:

## ALL CASES

MDL 2804

**CASE NO.: 1:17-MD-2804**

**JUDGE DAN A. POLSTER**

**MOTION FOR LEAVE TO FILE MSP PLAINTIFFS' MOTION FOR  
APPOINTMENT TO A POSITION ON THE PLAINTIFFS' EXECUTIVE COMMITTEE**

Plaintiffs, MSP Recovery Claims, Series LLC, MSPA Claims 1, LLC and MAO-MSO Recovery II, LLC (collectively, “the MSP Plaintiffs”), on behalf of themselves and a class of similarly-situated entities and their assignees, by and through undersigned counsel, respectfully move for leave to file a Motion for Appointment to a Position on the Plaintiffs’ Executive Committee. In support, the MSP Plaintiffs state as follows:

1. The MSP Plaintiffs filed two separate, but similar, class action complaints that are now pending before this Court: *MSP Recovery Claims, Series LLC v. Purdue Pharma, L.P., et al.*, Case No.: 1:18-OP-45091 (N.D. Ohio); and *MSPA Claims I, LLC, et al. v. Anda, Inc., et al.*, Case No.: 1:18-OP-45526 (N.D. Ohio). The MSP Plaintiffs and putative class members have the unique position of being “**payors of last resort**” in that they stand in the same shoes as their respective state Medicaid agencies (“PLR Class”).<sup>1</sup> This class of Plaintiffs may be the largest in the litigation,

<sup>1</sup> Medicaid, as used herein, means the joint federal-state medical assistance program authorized by Title XIX of the Social Security Act, 42 U.S.C. § 1396, et seq. Under the federal scheme, Medicaid is intended to be the “payor of last resort.” *See* Federal Register, Vol. 81, No. 88, 27498 through 27901, 27769 (May 6, 2016). Title XIX of the Act requires state Medicaid agencies to identify and seek payment from liable third parties, before billing Medicaid.

will have a profound effect on many other cases in the litigation, and has absolutely no adequate representation whatsoever on the Plaintiffs' Executive Committee.

2. As "payors of last resort," the MSP Plaintiffs and PLR Class are in a separate class of plaintiffs with significantly distinct rights of recovery from the Third-Party Payors, Hospital, and Governmental Entity plaintiffs, that are currently represented by the Plaintiffs' Co-Leads, Co-Liaisons, and Plaintiffs' Executive Committee. Based on the current composition of the Plaintiffs' leadership structure, however, the MSP Plaintiffs and PLR Class are not being adequately and appropriately represented on the Plaintiffs' Executive Committee and/or on the Plaintiffs' settlement negotiating team approved by this Court. *See* January 4, 2018 Order (docket no. 37), granting Plaintiffs' Renewed Motion to Approve Co-Leads, Co-Liaisons and Executive Committee (docket no. 34).

3. Moreover, the MSP Plaintiffs and PLR Class's claims for damages are potentially adverse to some of the claims for damages being asserted by the State Attorneys General and other Governmental Entity plaintiffs to the extent they are seeking reimbursement for opioid-related health care and services paid on behalf of Medicaid beneficiaries that were actually paid for by the MSP Plaintiffs and PLR Class. The sheer size of the MSP Plaintiffs PLR Class and their extensive rights of recovery under the mandatory Medicaid managed care systems implemented by many states, could potentially encompass and override a substantial portion of the damages being sought by the State Attorneys General and Governmental Entity plaintiffs.

4. As set forth in greater detail in the proposed Motion for Appointment to a Position on the Plaintiffs' Executive Committee, the MSP Plaintiffs and PLR Class are an indispensable and critically important stakeholder in this litigation and will play a pivotal role in any potential global resolution of this matter.



5. The MSP Plaintiffs, by and through undersigned counsel, directly raised these concerns with the Plaintiffs' leadership and Special Masters. Having received no formal response, the MSP Plaintiffs and PLR Class are left with no choice but to file the proposed Motion and seek the Court's intervention.

6. Pursuant to ¶ 6(g) of CMO-1 (docket no. 232), the MSP Plaintiffs and PLR Class respectfully request that this Court enter an Order granting leave to file the proposed Motion for Appointment to a Position on the Plaintiffs' Executive Committee.

7. A proposed Order is attached as **Exhibit A** and the proposed Motion for Appointment to a Position on the Plaintiffs' Executive Committee is attached as **Exhibit B**.

DATED this 1<sup>st</sup> day of June, 2018.

Respectfully submitted,

*Attorney for Plaintiffs, MSP Recovery Claims, Series LLC, MSPA Claims I, LLC and MAO-MSO Recovery II, LLC*

By: /s/ James L. Ferraro

James L. Ferraro, Esq.  
Florida Bar No.: 381659  
Ohio Bar No.: 0076089  
Janpaul Portal, Esq.  
Florida Bar No.: 0567264  
James L. Ferraro, Jr., Esq.  
Florida Bar No.: 107494  
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[jpp@ferrarolaw.com](mailto:jpp@ferrarolaw.com)  
[jjr@ferrarolaw.com](mailto:jjr@ferrarolaw.com)

**AND**

John H. Ruiz, Esq.  
Florida Bar No.: 928150  
Frank C. Quesada, Esq.  
Florida Bar No.: 29411  
**MSP Recovery Law Firm**  
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Email: [jruiz@msprecovery.com](mailto:jruiz@msprecovery.com)  
[fquesada@msprecovery.com](mailto:fquesada@msprecovery.com)  
[serve@msprecovery.com](mailto:serve@msprecovery.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on June 1, 2018, I electronically filed the foregoing document with the Clerk for the United States District Court, Northern District of Ohio. The electronic case filing system (CM/ECF) will send a Notice of Electronic Filing (NEF) to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ James L. Ferraro

James L. Ferraro, Esq.

## **EXHIBIT D**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

MAO-MSO RECOVERY II, LLC, a Delaware  
entity; MSP RECOVERY, LLC, a Florida entity;  
MSPA CLAIMS 1, LLC, a Florida entity,

Plaintiffs,

vs.

STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY, an Illinois Company,

Defendant.

Case No. 3:17-cv-321

CLASS ACTION COMPLAINT

DEMAND FOR JURY TRIAL

**PLAINTIFFS' CORPORATE DISCLOSURE STATEMENT**

Plaintiffs, MAO-MSO Recovery II, LLC, MSP Recovery, LLC, and MSPA Claims 1, LLC, through undersigned counsel, file their Corporate Disclosure Statement, pursuant to Federal Rule of Civil Procedure 7.1, and, in support thereof, state as follows:

1. MAO-MSO Recovery II, LLC, is owned by RD Legal Finance, LLC, and MSP Recovery, LLC.
2. MSP Recovery, LLC, has no parent corporation.
3. MSPA Claims 1, LLC, is owned by MSP Recovery Services, LLC.
4. There is no publicly held corporation that owns 10% or more of its stock for any of the three entities listed above.

Dated: March 28, 2017

Respectfully submitted by,

/s/ David M. Hundley

David M. Hundley, Of Counsel  
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Christopher L. Coffin (to be moved *pro hac vice*)  
Courtney L. Stidham (to be moved *pro hac vice*)  
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Michael L. Baum (to be moved *pro hac vice*)  
R. Brent Wisner (to be moved *pro hac vice*)  
Pedram Esfandiary (to be moved *pro hac vice*)  
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pesfandiary@baumhedlundlaw.com

***Counsel for Plaintiffs***

## **EXHIBIT E**

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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

MAO-MSO RECOVERY II, LLC, a  
Delaware entity; MSP RECOVERY,  
LLC, a Florida entity; MSPA CLAIMS 1,  
LLC, a Florida entity,

Plaintiffs,

vs.

THE FARMERS INSURANCE  
EXCHANGE, and its subsidiaries and  
affiliates; and THE FARMERS GROUP  
INC. d/b/a FARMERS UNDERWRITER'S  
ASS'N, and its subsidiaries and affiliates,

Defendants.

Case No.: 2:17-cv-2559

**PLAINTIFFS' CORPORATE  
DISCLOSURE STATEMENT**

Plaintiffs, MAO-MSO Recovery II, LLC, MSP Recovery, LLC, and MSPA  
Claims 1, LLC, through undersigned counsel, file their Corporate Disclosure Statement,  
pursuant to Federal Rule of Civil Procedure 7.1, and, in support thereof, state as follows:

1. MAO-MSO Recovery II, LLC, is owned by RD Legal Finance, LLC, and  
MSP Recovery, LLC.
2. MSP Recovery, LLC, has no parent corporation.



3. MSPA Claims 1, LLC, is owned by MSP Recovery Services, LLC. There is no publicly held corporation that owns 10% or more of its stock for any of the three entities listed above.

Dated: April 3, 2017

**BAUM HEDLUND ARISTEI & GOLDMAN,  
P.C.**

/s/ R. Brent Wisner  
R. Brent Wisner, Esq. (SBN 276023)  
[rbwisner@baumhedlundlaw.com](mailto:rbwisner@baumhedlundlaw.com)  
Michael L. Baum, Esq. (SBN 119511)  
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Pedram Esfandiary, Esq., (SBN 312569)  
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**PENDLEY, BAUDIN & COFFIN, LLP**  
Christopher L. Coffin (to be moved *pro hac vice*)  
Tracy L. Turner (to be moved *pro hac vice*)  
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[cstidham@pbclawfirm.com](mailto:cstidham@pbclawfirm.com)

*Attorneys for Plaintiffs*

## **EXHIBIT F**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

MAO-MSO RECOVERY II, LLC, a Delaware  
entity; MSP RECOVERY, LLC, a Florida entity;  
MSPA CLAIMS 1, LLC, a Florida entity,

Plaintiffs,

vs.

STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY, an Illinois Company,

Defendant.

Case No. 3:17-cv-321

CLASS ACTION COMPLAINT

DEMAND FOR JURY TRIAL

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**PLAINTIFFS' CORPORATE DISCLOSURE STATEMENT**

Plaintiffs, MAO-MSO Recovery II, LLC, MSP Recovery, LLC, and MSPA Claims 1, LLC, through undersigned counsel, file their Corporate Disclosure Statement, pursuant to Federal Rule of Civil Procedure 7.1, and, in support thereof, state as follows:

1. MAO-MSO Recovery II, LLC, is owned by RD Legal Finance, LLC, and MSP Recovery, LLC.
2. MSP Recovery, LLC, has no parent corporation.
3. MSPA Claims 1, LLC, is owned by MSP Recovery Services, LLC.
4. There is no publicly held corporation that owns 10% or more of its stock for any of the three entities listed above.

Dated: March 28, 2017

Respectfully submitted by,

/s/ David M. Hundley  
David M. Hundley, Of Counsel  
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***Counsel for Plaintiffs***

## **EXHIBIT G**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN**

MAO-MSO RECOVERY II, LLC, a Delaware  
entity; MSP RECOVERY, LLC, a Florida entity;  
MSPA CLAIMS 1, LLC, a Florida entity,

Plaintiffs,

vs.

AMERICAN FAMILY MUTUAL INSURANCE  
COMPANY, a Wisconsin company; and  
AMERICAN FAMILY INSURANCE  
COMPANY, a Wisconsin company,

Defendants.

Case No. 17-cv-175

CLASS ACTION COMPLAINT

DEMAND FOR JURY TRIAL

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**PLAINTIFFS' CORPORATE DISCLOSURE STATEMENT**

Plaintiffs, MAO-MSO Recovery II, LLC, MSP Recovery, LLC, and MSPA Claims 1, LLC, through undersigned counsel, file their Corporate Disclosure Statement, pursuant to Federal Rule of Civil Procedure 7.1, and, in support thereof, state as follows:

1. MAO-MSO Recovery II, LLC, is owned by RD Legal Finance, LLC, and MSP Recovery, LLC.
2. MSP Recovery, LLC, has no parent corporation.
3. MSPA Claims 1, LLC, is owned by MSP Recovery Services, LLC.
4. There is no publicly held corporation that owns 10% or more of its stock for any of the three entities listed above.

Dated: March 8, 2017

Respectfully submitted by,

/s/R. Brent Wisner

R. Brent Wisner

Michael L. Baum (to be moved *pro hac vice*)

Pedram Esfandiary (to be moved *pro hac vice*)

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Tracy L. Turner (to be moved *pro hac vice*)

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***Counsel for Plaintiffs***

## **EXHIBIT H**



M18000006037

(Requestor's Name)

(Address)

(Address)

(City/State/Zip/Phone #)

☐ PICK-UP

☐ WAIT

☐ MAIL

(Business Entity Name)

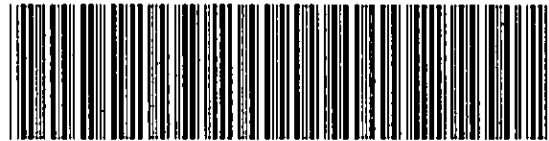
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W18-33015 Penalty

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FILED  
18 JUN 21 PM 3:10  
SECRETARY OF STATE  
HALL OF RECORDS

K SALY  
JUN 28 2018



FLORIDA DEPARTMENT OF STATE  
Division of Corporations

April 6, 2018

NAISLETH RODRIGUEZ  
MSP RECOVERY LLC  
5000 SW 75 AVE, STE. 400  
MIAMI, FL 33155

SUBJECT: MSP RECOVERY CLAIMS, SERIES LLC  
Ref. Number: W18000033015

We have received your document for MSP RECOVERY CLAIMS, SERIES LLC and your check(s) totaling \$160.00. However, the enclosed document has not been filed and is being returned for the following correction(s):

Pursuant to section 607.1502<sup>✓</sup>(4), 617.1502(4) or 605.0904(7), Florida Statutes, this entity is liable for a civil penalty of at least \$500 but not more than \$1000 for each year this entity transacted business or conducted its affairs in Florida prior to qualification. In addition to this civil penalty, the appropriate annual report fees that would have been due this office had the entity qualified the year it began operations in this state are also due. The amount due this office to cover both annual report(s) and penalty fees is \$638.75.

*2017/2018*

There is a balance due of \$638.75.

Please return your document, along with a copy of this letter, within 60 days or your filing will be considered abandoned.

If you have any questions concerning the filing of your document, please call (850) 245-6051.

Karen A Saly  
Regulatory Specialist II

Letter Number: 818A00007024

**COVER LETTER**

**TO: Registration Section  
Division of Corporations**

**SUBJECT:** MSP Recovery Claims, Series LLC

\_\_\_\_\_  
Name of Limited Liability Company

The enclosed "Application by Foreign Limited Liability Company for Authorization to Transact Business in Florida," Certificate of Existence, and check are submitted to register the above referenced foreign limited liability company to transact business in Florida.

Please return all correspondence concerning this matter to the following:

Naisleth Rodriguez

\_\_\_\_\_  
Name of Person

MSP Recovery LLC

\_\_\_\_\_  
Firm/Company

5000 SW 75 Ave. Suite 400

\_\_\_\_\_  
Address

Miami, Florida 33155

\_\_\_\_\_  
City/State and Zip Code

NRodriguez@msprecovery.com

\_\_\_\_\_  
E-mail address: (to be used for future annual report notification)

For further information concerning this matter, please call:

Naisleth Rodriguez

305

614-2222

at (\_\_\_\_\_) \_\_\_\_\_

\_\_\_\_\_  
Name of Contact Person

\_\_\_\_\_  
Area Code

\_\_\_\_\_  
Daytime Telephone Number

**MAILING ADDRESS:**

Division of Corporations  
Registration Section  
P.O. Box 6327  
Tallahassee, FL 32314

**STREET ADDRESS:**

Division of Corporations  
Registration Section  
Clifton Building  
2661 Executive Center Circle  
Tallahassee, FL 32301

Enclosed is a check for the following amount:

☐ \$125.00 Filing Fee

☐ \$130.00 Filing Fee &  
Certificate of Status

☐ \$155.00 Filing Fee &  
Certified Copy

☒ \$160.00 Filing Fee, Certificate  
of Status & Certified Copy

APPLICATION BY FOREIGN LIMITED LIABILITY COMPANY FOR AUTHORIZATION TO TRANSACT BUSINESS  
IN FLORIDA

IN COMPLIANCE WITH SECTION 605.0902, FLORIDA STATUTES, THE FOLLOWING IS SUBMITTED TO REGISTER A FOREIGN LIMITED LIABILITY COMPANY TO TRANSACT BUSINESS IN THE STATE OF FLORIDA:

1. MSP Recovery Claims, Series LLC  
(Name of Foreign Limited Liability Company; must include "Limited Liability Company," "L.L.C.," or "LLC.")
2. The State of Delaware  
(Jurisdiction under the law of which foreign limited liability company is organized)
3. 82-5013004  
(FEI number, if applicable)
4. February 14, 2017  
(Date first transacted business in Florida, if prior to registration)  
(See sections 605.0904 & 605.0905, F.S. to determine penalty liability)
5. 5000 SW 75 Ave, Suite 400  
(Street Address of Principal Office)  
Miami, Florida 33155
6. 5000 SW 75 Ave Suite 400  
(Mailing Address)  
Miami, Florida 33155
7. Name and street address of Florida registered agent: (P.O. Box NOT acceptable)  
Name: La Ley con John H Ruiz P.A.  
Office Address: 5000 SW 75 Ave, Suite 400  
Miami, Florida 33155  
(City) (Zip code)

Registered agent's acceptance:

Having been named as registered agent and to accept service of process for the above stated limited liability company at the place designated in this application, I hereby accept the appointment as registered agent and agree to act in this capacity. I further agree to comply with the provisions of all statutes relative to the proper and complete performance of my duties, and I am familiar with and accept the obligations of my position as registered agent.

(Registered agent's signature)

8. The name, title or capacity and address of the person(s) who has/have authority to manage is/are:

Title or Capacity:	Name and Address:	Title or Capacity:	Name and Address:
Director	John H Ruiz 5000 SW 75 Ave, Suite 400 Miami, Florida 33155		

(Use attachments if necessary)

9. Attached is a certificate of existence, no more than 90 days old, duly authenticated by the official having custody of records in the jurisdiction under the law of which it is organized. (If the certificate is in a foreign language, a translation of the certificate under oath of the translator must be submitted)

10. This document is executed in accordance with section 605.0203 (1) (b), Florida Statutes. I am aware that any false information submitted in a document to the Department of State constitutes a third degree felony as provided for in s.817.155, F.S.

(Signature of an authorized person)

John H Ruiz

Typed or printed name of signer

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CLERK OF STATE

# Delaware

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Page 1

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "MSP RECOVERY CLAIMS, SERIES LLC" IS DULY FORMED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE THIRTIETH DAY OF MARCH, A.D. 2018.

AND I DO HEREBY FURTHER CERTIFY THAT THE AFORESAID "MSP RECOVERY CLAIMS, SERIES LLC" IS A SERIES LIMITED LIABILITY COMPANY.

AND I DO HEREBY FURTHER CERTIFY THAT THE SAID "MSP RECOVERY CLAIMS, SERIES LLC" WAS FORMED ON THE FOURTEENTH DAY OF FEBRUARY, A.D. 2017.

AND I DO HEREBY FURTHER CERTIFY THAT THE ANNUAL TAXES HAVE BEEN ASSESSED TO DATE.


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NOTARY PUBLIC  
STATE OF DELAWARE



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You may verify this certificate online at [corp.delaware.gov/authver.shtml](http://corp.delaware.gov/authver.shtml)

  
Jeffrey W. Bullock, Secretary of State

Authentication: 202424966

Date: 03-30-18